

Exhibit 1

To: A [redacted] B [redacted] C [redacted]
From: D [redacted] E [redacted]
Sent: Mon 5/9/2016 10:09:12 PM (UTC)
Subject: Re: [tasks] [redacted]: Clarify policies around platform scraping for politics

D [redacted] E [redacted] commented: Let's keep this open. F [redacted] and I are going to put something together that is a more business friendly description of what we allow with respect to third party data collection and use. This will serve as a reminder to get that done.
D [redacted] E [redacted] changed the subscribers. Added: F [redacted] G [redacted]

[redacted] Clarify policies around platform scraping for politics

RECENT ACTIVITY

D [redacted] E [redacted] commented:
Let's keep this open. F [redacted] and I are going to put something together that is a more business friendly description of what we allow with respect to third party data collection and use. This will serve as a reminder to get that done.

D [redacted] E [redacted] changed the subscribers. Added: F [redacted] G [redacted]

Comment · Close · Unsubscribe · Assign · Add Subscribers · Tag · Set Priority · Star

STATUS	Open
PRIORITY	None
OWNER	D [redacted] E [redacted]
CREATED	Sep 22, 2015 9:27am by H [redacted] I [redacted]
DESCRIPTION	Hi D [redacted] - Our team has been spending a lot of time lately attempting to clarify to clients in the political space how our policies apply to pitches coming from vendors regarding matching social data to voter files. You'll recall TrendPo using scraped engager audiences last year to create custom audiences - we suspect many of these companies are doing similar types of scraping, the largest and most aggressive on the conservative side being Cambridge Analytica (http://ca-political.org/what-we-do/), a sketchy (to say the least) data modeling company that has penetrated our market deeply. Because the frequency with which this is coming up has increased drastically in the past few weeks, we'd like to work with your team to make sure we have clear channels between our teams. Specifically, we need answers to the following questions: 1. Can we develop template messaging to advise clients on how our policies apply to these types of services? Does this already exist? (I believe I remember enforcement relying on a few different policies last year). 2. Can you help us investigate what Cambridge specifically is actually doing? 3. One vendor offering beyond Cambridge we're concerned with (given their prominence in the industry) is NationBuilder's "Social Matching," on which they've pitched our clients and their website simply says "Automatically link the emails in your database to Facebook, Twitter, LinkedIn and Klout profiles, and pull in social engagement activity." I'm not sure what that means, and don't want to incorrectly tell folks to avoid it, but it is definitely being conflated in the market with other less above board services. Can you help clarify what they're actually doing? Please let us know if you need any more information. Thanks in advance!

TAGS platform policy politics oncall

SUBSCRIBERS



COMMENT HISTORY

D [REDACTED] E [REDACTED]

Let's keep this open. F [REDACTED] and I are going to put something together that is a more business friendly description of what we allow with respect to third party data collection and use. This will serve as a reminder to get that done.

May 9, 2016 3:08pm

J [REDACTED] K [REDACTED] L [REDACTED]

Is there anything else needed here, or are we okay to close out?

May 6, 2016 9:58am

D [REDACTED] E [REDACTED]

FullContact update: We've received a response from the FullContact team that they've taken the necessary steps from remove FB data from their product offering: "Please note that new updates to FullContact's apps reflecting these changes I believe are still pending approval from Apple, but should be live shortly."

Feb 12, 2016 3:38pm

J [REDACTED] K [REDACTED] L [REDACTED]

D [REDACTED] and I spoke with FullContact yesterday. They have agreed to remove any current and stored data obtained from Facebook via our APIs from their service, and to remove any references to Facebook from their site. They have agreed to do this by February 13th (the deadline decided upon on the call).

Please let me know if we'd like to host a similar call with For America; I will hold out on outreach until I hear otherwise.

Jan 28, 2016 12:52pm

J [REDACTED] K [REDACTED] L [REDACTED]

Great, sent! (TPS 299056219). Will follow up with response.

Jan 21, 2016 1:17pm

D [REDACTED] E [REDACTED]

Let's do it. Thanks, J [REDACTED]!

Jan 21, 2016 12:25pm

J [REDACTED] K [REDACTED] L [REDACTED]

Thanks, all! To clarify, I will reach out to EE [REDACTED] FF [REDACTED], [REDACTED] of For America (page <https://www.facebook.com/ForAmerica/?fref=ts>), as well as Full Contact (app ID 184998594896953; contact address billing@fullcontact.com) and set up separate calls with both. Please confirm and I'll reach out today!

Jan 21, 2016 12:20pm

D [REDACTED] E [REDACTED]

To clarify, Nation Builder didn't say ForAmerica did anything wrong. Instead, they indicated that ForAmerica was the organization that tipped them off that Facebook was looking into them. At the same time they apparently terminated any agreements they had with Nation Builder.

Jan 21, 2016 10:38am

M [REDACTED] N [REDACTED]

Hi D [REDACTED], Thanks for that. Just to circle back to the original context on this thread: the agency for ForAmerica is who actually filed the original complaint on Nation Builder - so I find it a bit strange (and potentially suspicious) that Nation Builder is now pointing fingers back to ForAmerica :) ForAmerica's agency was concerned Nation Builder was pitching violating products. At any rate, if you would like the individual who used to work on the ForAmerica account at the agency who complained originally - it is GC [REDACTED] HH [REDACTED]: [REDACTED]@CRCPublicRelations.com. Please note he no longer works on this business as ForAmerica has taken it in house. That said, I think if you are investigating the full scope of violations, GC [REDACTED] is a fine place to start even if not officially associated with ForAmerica. On the other hand, this is the ForAmerica digital director: [REDACTED]@foramerica.org. Please note we have no working relationship with him, as we do all their support via their agency.

Jan 21, 2016 9:51am

D [REDACTED] E [REDACTED]

Hi J [REDACTED] - Yes, let's set up separate calls. Let me know if you need my help or if you can handle that for us. Thank you in advance!

Everyone - Full Contact is a service provider used by Nation Builder. Full Contact is in violation of our data policies. For America was brought up by Nation Builder. For America is no longer a client of Nation Builder, and it was For America who told Nation Builder we were going to be contacting them.

Jan 15, 2016 2:13pm

J █ K █ L █

Only D █ has context on this as she hosted the call with NationBuilder while I was out.

Jan 15, 2016 12:57pm

C █ F █

Hi All, just wanted to echo M █ N █ - can you tell us how ForAmerica got brought into the conversation most recently, and what specifically you'll be approaching them about? We can help point you to the right person to talk to over there depending on what you'll be asking them about.

Jan 15, 2016 9:26am

J █ K █ L █

Thanks for the update D █, and for leading the call! Following up now that I'm back from PTO - would you like me to investigate and set up calls with Full Contact and the page owners of For America? (Let me know if you'd like me to set up a short sync for us to catch up on this).

Jan 14, 2016 10:51pm

M █ N █

Great, thanks for talking with them.

Question: did Nation Builder point to Full Contact? Or how did that get surfaced?

Also how was ForAmerica broached in that conversation (or are you mentioning them based on our previous internal conversations?)

Jan 8, 2016 3:51pm

D █ E █

Just finished the call with NationBuilder. They are going to make a few changes but ultimately I didn't surface major policy issues with their service. From this conversation we need to broaden the investigation to another company called Full Contact, and I'd also like to set up a call with the page owner(s) of For America.

Jan 8, 2016 3:46pm

J █ K █ L █

I just received a response from I █ who put me in contact with the correct representative from the company (KK █); I've asked KK █ for his availability for this week and will schedule the call with D █ as soon as I receive a response.

Jan 5, 2016 3:57pm

D █ E █

My team is not in contact, and I assume you are still the owner on the DevOps side, so perhaps reply asking I █ who KK █ has a call with, as it may be in regards to a separate matter. Happy new year!

Jan 4, 2016 11:22am

J █ K █ L █

Update: I hadn't received an email from I █ over the holidays so sent him a follow-up email, and just received the following response:

"Hi M █,

My understanding is that your team has a call scheduled with KK █ LL █ from our Product Team, who I think is better equipped to discuss our relationship with Facebook than I. Thanks for reaching out!

Best,

I █

Did anyone on this thread schedule this or have context? If I'm no longer needed in orchestrating this please let me know.

Jan 4, 2016 10:08am

J █ K █ L █

Thanks M █. I've reached out to I █ directly (TPS 292525889).

Dec 28, 2015 11:20pm

M █ N █

I █ is more senior, so that's probably better for the purposes of this. EE █ is an █ person (who, we do know, helps our clients actually do the mechanics of connecting their apps to pages.)

Dec 27, 2015 9:06pm

J █ K █ L █

I've not yet received a response from my outreach to Nation Builder via the app's listed contact address. M █, I can therefore reach out again via one of your direct contacts - is there a preference for I █ or EE █? Or should I include them both on my outreach?

Dec 27, 2015 8:51pm

Thanks all. Yes, I found an associated app: NationBuilder (126739610711965), 132k MAP. The app has passed review and seems to be actively pulling some data based on my scuba data dive. The contact address the developer has listed on the app is info@nationbuilder.com.

This should come from J [REDACTED] and I'll support. J [REDACTED] am I correct we found an app for them which means we have their dev email address or am I off? Just on mobile so did not parse through the task.

OC [REDACTED] PP [REDACTED] is the "[REDACTED]" in the US - [REDACTED]@nationbuilder.com. QC [REDACTED] RR [REDACTED] is their [REDACTED] but we don't have an email for him off hand. SS [REDACTED] TT [REDACTED] is another [REDACTED] person who our clients have used for support on linking their app into their FB pages [REDACTED]@nationbuilder.com.

J [REDACTED] do you want to reach out to them or do you want us to? My contact there is UU [REDACTED] VV [REDACTED] [REDACTED]@nationbuilder.com and he handles their international accounts but could put us in touch with the right folks to have the call with.

That would be great! As DJ mentioned I've been digging into Nation Builder following our call with Strategic Media 21 though am struggling to fully understand the app based on online investigation alone. Here's what I've found:

- NationBuilder (126739610711965), 132k MAP
- Passed review for following permissions (<https://our.cstools.facebook.com/.../crow/apps/submission-su.../>): user_events, publish_actions, rsvp_event, manage_pages
- Actively pulling these perms: <https://fburl.com/188631556>

- In short the app seems to offer monthly subscription services for politicians, nonprofits, unions, etc building profiles based (in part) on information pulled from the person's activity on the client's Facebook Page. It then seems to offer correspondence services for the client's 'voter database,' including email blasts and text messages. From the 'How to connect to FB' FAQ page (http://nationbuilder.com/how_to_facebook_twitter#facebook):

"Types of Facebook page interactions logged in a nation:

1. Someone comments on an official post in a Facebook page
2. Someone creates a new post on a Facebook page
3. Someone likes an official post in a Facebook page
4. Someone RSVPs to an event via Facebook - if that Facebook event is connected to an event in your nation.

The entire list of people who have liked the Facebook page cannot be added to your people database. It is also not possible to access an individual person's friends list in a nation."

{1740343496196792}

You can "tag" people that like a post on your Page (http://nationbuilder.com/tag_people_who_liked_a_facebook_po..)

I can continue to dig in, though would potentially suggest a call wit the developer to ask directly how they're using data from Facebook. D mentioned she is on PTO until the 28th - if we opt for a call, is this something I should schedule for after the 28th, or is the Nation Builder aspect of this high pri?

██████████/J ██████████, if you need a contact at Nation Builder we have that.

Dec 17, 2015 12:16pm

D [REDACTED] E [REDACTED]

We are investigating Nation Builder and will reach out to them for a mtg after checking internally to see if we have any relationship with them. J [REDACTED] is on point. We met with Strategic Media yesterday and from that conversation it's clear we need to focus first on Nation Builder.

Dec 16, 2015 1:43pm

M [REDACTED] N [REDACTED]

@ [REDACTED]:D [REDACTED], while we sort out the Cambridge Analytica/Research use of data question, can we parallel process two other elements to get ahead of future issues? On Friday, we chatted about equipping our team with a "plain English" description of what is in and out of bounds for data matching in the space. We often point people to the terms, but even having a little more general of a framework/what are the bright lines would equip our sales team in market better.

Also you help us get a review of other potentially violating vendors (also mentioned in the original task here)? Specifically Nation Builder, who has been pitching many data matching/enriching services using FB as a component. This is one such pitch email our client received (the client in question, ForAmerica, did not proceed on this since they believed it to be out of terms, which is why they flagged this for us). This was a project that would leverage Strategic Media (whom I believe @ [REDACTED]:J [REDACTED] is working on?) and Nation Builder.

"XXX will take ForAmerica's community of 7.6 million Facebook likes and create a database identifying people who like ForAmerica posts and in many cases use data matching to layer other information points over these individuals, including methods of contact and interests.

In order to do this, XXX will first set up an API to gather data on anyone who "Likes" a post on ForAmerica's page. Once a critical mass is reached, XXX will match this list against our database of names, phone numbers, e-mails and mailing addresses of 82 million conservatives and Christians and their friends.

Our initial data gathering and matching run will take place over the two months in October and November. Our estimates are that this data run would generate a 1.25 - 3 million person database (this is an estimate and not a guarantee) that could be broken down along the following lines:

100,000-250,000: Full Data Match- name, street address, phone number, email, DOB and number of interactions with ForAmerica (can be used to assign donorvalue at later date)

150,000 - 300,000: Partial Match- Name, City, State, DOB (can be matched against voter file to determine physical address at a future date) and number of interactions with ForAmerica

1-2.5 million: Facebook Profile- Name and Facebook ID of individual interacting with ForAmerica"

Dec 16, 2015 11:38am

S [REDACTED] T [REDACTED]

Im happy to cover with you, but up to you! D [REDACTED], thanks for organizing.

Dec 11, 2015 5:16pm

U [REDACTED] V [REDACTED]

D [REDACTED] - Please include me on all items related to this and I'll pull in folks as needed. S [REDACTED] / A [REDACTED] - Do you both need to be involved in meetings / investigation, etc. or can one of you cover (with me)? Thanks.

Dec 11, 2015 4:27pm

D [REDACTED] E [REDACTED]

Update: We are reaching out to Dr. Kogan and will schedule a call in addition to asking for immediate responses over email. Please be sure not to contact Dr. Kogan or discuss anything pertaining to this investigation if he contacts you. If he does contact you, please put him in touch with me directly.

DevOps team - are S [REDACTED] and A [REDACTED] my poc for this investigation or should I include anyone else on any mtgs we schedule (want to make sure I'm looping in the right people)?

Dec 11, 2015 4:17pm

W [REDACTED] X [REDACTED] Y [REDACTED] Z [REDACTED]

Hey team, AA [REDACTED] pointed me to this thread. Alex Kogan was my postdoc supervisor at Cambridge, although I left before he founded GSR. I have a cursory understanding on the basic principles behind GSR's products and data collection methods, if that helps. Feel free to ask me anything.

Dec 11, 2015 3:50pm

AA [REDACTED] BE [REDACTED]

Hi - I'm a bit familiar with some of the context around the personality modeling stuff. As I understand it, it's inspired from <http://www.pnas.org/content/110/15/5802.abstract> which is solid science. I'm good friends with the lead author from that paper (Michal Kosinsky) and he is not happy about how these guys are bringing his field of research into disrepute. He's offered to chat with people on our end and to give more context if that helps. edit: to be clear, the datasets mentioned in the Guardian article are different/collected differently to those in the PNAS research!

Dec 11, 2015 3:22pm

U [REDACTED] V [REDACTED]

Taking a broader perspective on how to manage this moving forward, I've been in touch with Q [REDACTED] and team in DC to see if there is a better way to

explain our policies - not only on the data side, but also ensuring all political apps are platform policy compliant prior to launching. We've had cases where apps were restricted or disabled as a result of violations and that's a bad experience for everyone involved. (Ben Carson app this week, White House app earlier this year, etc.) We have a more immediate concern here, but would love to help educate.

Dec 11, 2015 2:18pm

M ██████ N ██████

Also, importantly: according to the Wait, What thread and also an email from WW ██████ XX ██████ - it sounds like Facebook has worked with this "Aleksandr Kogan" on research with the Protect & Care team.

Dec 11, 2015 1:04pm

H ██████ I ██████

The relevant part from the Guardian article on the supposed connection between SCL and GSR:

By summer 2014, Kogan's company had created an expansive and powerful dataset. His business partner boasted on Linked In that their private outfit Global Science Research (GSR), "owns a massive data pool of 40+ million individuals across the United States – for each of whom we have generated detailed characteristic and trait profiles".

Documents show SCL agreed to a contract with GSR, whereby it would pay its data collection costs in order to improve "match rates" against SC L's existing datasets or to enhance GSR's algorithm's "national capacity to profile capacity of American citizens".

In an email, Kogan said he was unable to explain in detail where all the data came from, as he was restricted by various confidentiality agreements. He said SCL is no longer a client.

He said that while GSR often used MTurk for data collection, it "never collected more than a couple thousand responses on MTurk for any one project, or even across all projects for a single client – the vast majority of our MTurk data collection as a company is in the form of surveys only". He said GSR stores Facebook data anonymously.

Kogan explained that separate from his university role, his private company undertook various commercial ventures relating to data analysis. He said that when GSR collect Facebook data, the terms detail the use that information collected will be put to and make clear to participants that they are giving GSR full permission to use the data and user contribution for any purpose.

He said Cambridge University had "no knowledge of the clients or projects GSR had worked on" and that GSR has never used any data collected as part of his university activities.

Dec 11, 2015 12:59pm

S ██████ T ██████

Digging in more. A ██████ pulled this list of UIDs (first three are associated with Cambridge Analytica, last one is associated with GSR): <https://fburl.com/187082435>. I tried to find an obvious connection among the group, but wasn't able to (no shared apps, pages, etc among ALL four). This means that the Cambridge Analytica/GSR connection remains unconfirmed.

With that said, we found a Business ID (id: 402996616566868) for Cambridge Analytica with one admin: YY ██████ ZZ ██████. The business has a Page with 0 fans: <https://www.intern.facebook.com/cambridgeanalytica/>.

Lastly (and most interestingly), the business is associated with two other Pages: <https://www.intern.facebook.com/keepthepromise1/> (a ted cruz page that links here: <http://www.keepthepromise1.com/about/>) AND <https://www.intern.facebook.com/PCIAA/> (property casualty insurers which links here: <http://www.pciaa.net/about-us/about-pci>). Both Pages have roughly 1k likes.

Dec 11, 2015 12:56pm

H ██████ I ██████

D ██████ - I just looked more deeply on the GSR website and it appears they *are* offering PII via their API:

Reveal new depths of insight from your social media data with our API product, delivering the same consumer psychology insight provided by BrandAnalyzer at the individual level.

"Enrich Your Social Media Data

Augment social media data by appending deep psychological profiling, contextualized brand preferences, and more accurate consumer personas.

http://globalscienceresearch.com/#brand_analyzer_api

Dec 11, 2015 12:00pm

M [REDACTED] N [REDACTED]

As mentioned to D [REDACTED]: these are the two new hires Cambridge Analytica has made: AAA [REDACTED] BBE [REDACTED], [REDACTED]:
[REDACTED]@cambridgeanalytica.org;

YY [REDACTED] is [REDACTED] [REDACTED]@cambridgeanalytica.org

[https://cambridgeanalytica.org/_/Cambridge-Analytica-\[REDACTED\]](https://cambridgeanalytica.org/_/Cambridge-Analytica-[REDACTED])

Dec 11, 2015 11:32am

J [REDACTED] K [REDACTED] L [REDACTED]

Regarding speaking with Strategic Media 21, as I mentioned I've been having a back and forth with Strategic Media to set up time, I've asked GC [REDACTED] (the contact there) to speak with us next Tuesday at 4pm PST.

Dec 11, 2015 11:09am

S [REDACTED] T [REDACTED]

Unfortunately, a full analysis of Cambridge Analytica is challenging, since the site doesn't appear to be integrated with Facebook (no app id, Facebook Page, etc). While this is the case today, in order to have obtained Facebook data, the site must have had some integration in the past. Beyond the Guardian article, do you have additional information about the site's relationship to Facebook? If the article is true, then @ [REDACTED] :D [REDACTED] we may want to have a call to clarify the data collection piece. Again, I'm having trouble gathering more information than what's featured on their site. Let me know what you think.

Dec 11, 2015 11:08am

H [REDACTED] I [REDACTED]

A case study on applying these methods for Hostess: <http://globalscienceresearch.com/blog-promotions-trans-fats>

Dec 11, 2015 10:35am

H [REDACTED] I [REDACTED]

Screenshots of their tool attached.

Dec 11, 2015 10:20am

H [REDACTED] I [REDACTED]

you can register and see their data here: http://globalscienceresearch.com/_/205313./Facebook/Everyone

Dec 11, 2015 10:14am

H [REDACTED] I [REDACTED]

Adding U [REDACTED] V [REDACTED] from Developer Policy Enforcement

Dec 11, 2015 10:11am

H [REDACTED] I [REDACTED]

Here's a link to Global ScienceResearch, the "for profit" arm of CA mentioned in the article: <http://globalscienceresearch.com/>.

We had not heard of this org before the article. They operate a product called "BrandAnalyzer" which promises to "Instantly access over 15,000 brand reports with consumer psychology profiles and implementation guides generated from our social media data. Gain a high level overview of who supports your brand (and your competitors)."

Dec 11, 2015 10:06am

CC [REDACTED] DD [REDACTED]

Hi everyone – this is hi pri at this point. This story just ran in the Guardian and is now prompting other media requests. We need to sort this out ASAP. Thank you!

Dec 11, 2015 9:45am

M [REDACTED] N [REDACTED]

D [REDACTED], J [REDACTED] - Can you expedite the review of Cambridge Analytica or let us know what the next steps are? Unfortunately, this firm is now a PR issue as this story is on the front page of the Guardian website - <http://www.theguardian.com/.senator-ted-cruz-president-cam> ... CC [REDACTED] DD [REDACTED] is fielding comms policy requests and concerns.

Dec 11, 2015 9:34am

J [REDACTED] K [REDACTED] L [REDACTED]

Thanks M [REDACTED], yes I have been having a back-and-forth with the developer from Strategic Media attempting to set up a time to talk, though he has been slow to respond (though is responsive) and it has been difficult to pin down a time, particularly given the short week last week. As D [REDACTED] is out this week I will be setting up time next week to talk. Thanks for following up!

Nov 30, 2015 12:36pm

M [REDACTED] N [REDACTED]

Hi J [REDACTED] and D [REDACTED] - did either of you ever connect with Nation Builder or Strategic Media? Would love to know if we were able to learn if the methods that they sell their appending process is considered within terms.

Nov 30, 2015 11:42am

D [REDACTED] E [REDACTED]

Yes! But not after 3:30 PT

Nov 12, 2015 10:05pm

J [REDACTED] K [REDACTED] L [REDACTED]

Thanks! I just heard back from the developer and he says that any 30 minute timeslot tomorrow works. Does this work for you? If so, I'll try and get something set up. If not, please let me know which days work for you next week and I'll confirm a time.

Nov 12, 2015 9:06pm

D [REDACTED] E [REDACTED]

This week works. If he gives a few blocks of time I'm sure we can make it work. Just you and I are fine (unless U [REDACTED] wants to join). Thank you!

Nov 11, 2015 1:04pm

J [REDACTED] K [REDACTED] L [REDACTED]

The developer just got back to me noting he is free anytime this week. D [REDACTED], would it work for you if I schedule a call for this week? If so, is there anyone else we need to include on our end?

Nov 10, 2015 8:59pm

J [REDACTED] K [REDACTED] L [REDACTED]

As a follow-up note, I've reached out to Strategic Media (TPS 277017911) via the email address listed on the app ID associated with the strategic media site (ID 341917549290893). I have asked for times to talk next week and will follow up here when I hear back.

Oct 29, 2015 12:00pm

J [REDACTED] K [REDACTED] L [REDACTED]

Thanks, all! D [REDACTED] and I synced offline about this yesterday; I will run draft outreach wording by her before reaching out to schedule a call, and will update here with details once I've reached out. Please let me know if there are any questions or additional details in the interim.

Oct 21, 2015 9:06am

M [REDACTED] N [REDACTED]

Awesome, thanks D [REDACTED] and J [REDACTED]. Really appreciate this as I do suspect there is plenty of bad actor behavior going on .. both Nation Builder (who is more dominant in this space and where the original concern/scraping/appending issues are) as well as Strategic Media 21 are the two to reach out to. My sense is that Nation Builder sells these services to Strategic Media 21 so not sure how you want to approach but they are both worthy of some direct conversation.

Oct 20, 2015 1:40pm

D [REDACTED] E [REDACTED]

J [REDACTED] - We'll need to get on a call with this company b/c they appear to be violating our data policies, although it is hard to understand specifically what they are violating without having a conversation. Can you drive this for us? I'm happy to support the call. If you think we can manage it via email I defer to your team, but I suspect this may be easier if we talk this one out.

Oct 20, 2015 11:45am

M [REDACTED] N [REDACTED]

@ [REDACTED]:D [REDACTED], thanks for confirming this seems in violation. As @ [REDACTED]:H [REDACTED] mentioned there is a lot of confusion in the political space about how people use Facebook to connect with other offline sets of data. In particular, Strategic media 21 has been exerting a good deal of pressure on one of our clients to take advantage of this type of appending. This client's agency, who does not want to violate policy, is stuck in the middle of knowing this is happening and that it is out of policy - but on the other hand, doesn't want to ruin their client relationship by calling this other vendor out. We are seeing more of this type of activity in the political space, and since a few firms are now offering this type of service, clients assume that it's acceptable since no one has been told otherwise. How would you recommend proceeding here?

Oct 14, 2015 1:08pm

H [REDACTED] I [REDACTED]

The vendor is strategic media 21. <http://www.strategicmedia21.com/>

Creative Response Concepts is the agency that represents ForAmerica (not involved in pitching this at all – they received the below reactively) and is uncomfortable telling them to back off without firm enforcement here given that many of FA's peers are apparently utilizing these services.

From CRC:

"If it is not allowed and you all are able to formally tell us, I can get it stopped immediately. If it is allowed, I am sure I have other clients that will want to do it." They essentially want these guys to be shut down so they don't look like they're telling their client to play by a different set of rules from everyone else.

Is there anything devops can do with the information we have provided?

H [REDACTED] I [REDACTED]

facebook | instagram

U.S. Politics and Advocacy | Washington, DC

[redacted]@fb.com

Oct 13, 2015 2:24pm

[redacted] E [redacted]

There are likely a few data policy violations here. They can't collect information from public posts and share that information with any type of data broker (company XXX seems to operate in that fashion). We should tell ForAmerica not to proceed, as they (and any service provider acting on their behalf) must not collect and use information from us for this purpose. See, Platform Policies (<https://developers.facebook.com/policy>). Can you ensure the client doesn't proceed? Also, can you ask the client to tell us who the vendor is? We will keep it confidential and thank them in advance.

Oct 13, 2015 1:00pm

[redacted] F [redacted]

Hi All, we have some new information to share. Our client sent over the following email today referring to a Nationbuilder project their client (ForAmerica) is moving forward with, but redacted the middle man vendor. However, this is the person who presumably works for that middle man vendor that was added to their page as an analyst:

CCC [redacted] DDD [redacted] [redacted])

Email from the client:

"FYI – ForAmerica is moving forward with the Nation Builder project. There is a vendor in the middle and this is what they have indicated ForAmerica should end up with:

XXX will take ForAmerica's community of 7.6 million Facebook likes and create a database identifying people who like ForAmerica posts and in many cases use data matching to layer other information points over these individuals, including methods of contact and interests.

In order to do this, XXX will first set up an API to gather data on anyone who "Likes" a post on ForAmerica's page. Once a critical mass is reached, XXX will match this list against our database of names, phone numbers, e-mails and mailing addresses of 82 million conservatives and Christians and their friends.

Our initial data gathering and matching run will take place over the two months in October and November. Our estimates are that this data run would generate a 1.25 - 3 million person database (this is an estimate and not a guarantee) that could be broken down along the following lines:

- 100,000-250,000: Full Data Match- name, street address, phone number, email, DOB and number of interactions with ForAmerica (can be used to assign donor value at later date)
- 150,000 - 300,000: Partial Match- Name, City, State, DOB (can be matched against voter file to determine physical address at a future date) and number of interactions with ForAmerica
- 1-2.5 million: Facebook Profile- Name and Facebook ID of individual interacting with ForAmerica

My understanding is that they are using Nation Builder to do everything.

We've set up one of their folks as an analyst on the FA Facebook account."

Oct 13, 2015 11:36am

[redacted] I [redacted]

It's difficult to get app ID's for these companies since they're usually one-off for clients and they're not volunteering them, but I'll dig a little.

[redacted] I [redacted]

facebook | instagram

U.S. Politics and Advocacy | Washington, DC

[redacted]@fb.com

Sep 30, 2015 12:17pm

[redacted] E [redacted]

To set expectations, we can't certify/approve apps for compliance, and it's very likely these companies are not in violation of any of our terms. What may help is if you provide us with concrete examples of what we understand the apps to be doing that we think may violate our terms, and that can help us dive in. If we had more resources we could discuss a call with the companies to get a better understanding, but we should only explore that path if we do see red flags.

Sep 30, 2015 10:48am

[redacted] F [redacted]

Hi A [REDACTED] E [REDACTED] C [REDACTED], I will have to get back to you on the Cambridge app ID, but the NationBuilder app id is: 126739610711965, which we are also very interested if they are compliant. Thanks!

Sep 30, 2015 6:02am

A [REDACTED] E [REDACTED] C [REDACTED]

Hello, thanks for surfacing this very interesting question. To start: could you provide App IDs and App names for the apps that are engaging in this scraping of user data?

tl;dr—Need more info before can offer anything more definitive; but my hunch is that these apps' data-scraping activity is likely non-compliant (see FPPs cited below).

As for the website itself, I dug around a bit and couldn't find any very salient red flags. However, in light of our data-sensitivity-related policies, the following Facebook Platform Policies (FPPs) come to mind:

FPP3.9 - Don't sell, license, or purchase any data obtained from us or our services.

FPP3.10 - Don't transfer any data that you receive from us (including anonymous, aggregate, or derived data) to any ad network, data broker or other advertising or monetization-related service.

FPP7.4 - Request only the data and publishing permissions your app needs.

There are also more FPPs related to data stuff here: <https://developers.facebook.com/policy/#data>

As for your questions:

(1) I don't believe we currently have any language/boilerplate messaging re: political analysis/data-scraping apps.

(2) Please provide App IDs, I'd be happy to investigate their app's activity.

(3) Without App IDs to dig deeper, I can't say exactly what they're doing, but my initial hunch is that "automatically linking emails in your database to FB accounts" would be against our policies (whether for FPP or otherwise), mainly because it seems to access data that isn't explicitly being permitted access by the user (see FPP7.4 above). It also brings to mind the following:

FPP3.11 - Don't put Facebook data in a search engine or directory, or include web search functionality on Facebook.

With all the above-mentioned FPPs in mind, I imagine it would be *very* difficult to engage in data-scraping activity as you described while still being compliant with FPPs.

Passing back to @ [REDACTED]:D [REDACTED] for her thoughts.

Sep 29, 2015 5:38pm

D [REDACTED] E [REDACTED]

Hi team - I'm passing this to DevOps for initial review. They can help investigate and from there we can discuss. At a high level it is possible these services comply with our terms, but it is also possible they do not. I'm happy to meet with anyone who would like to learn more about our policies with respect to data collection and use. My calendar is up to date, so don't hesitate to find time for us.

Sep 29, 2015 8:57am

M [REDACTED] N [REDACTED]

D [REDACTED], Following up on H [REDACTED]' task here - we are getting several pointed questions from the political partner space around what is in bounds versus what is out of bounds. Many companies seem to be on the edge—possibly over. Would it be worth setting up a call to chat through the boundaries? or can you take a look at the cited examples and weigh in on the methods/tolerance for them? Thank you!

Sep 29, 2015 7:16am

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